

D. GEORGE SWEIGERT, C/O
336 BON AIR CENTER #241
GREENBRAE, CA 94904

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

D. GEORGE SWEIGERT
Plaintiff,

vs.

JASON GOODMAN
Defendant

Case No.: 2:18-cv-01633-RMG-BM

PLAINTIFF'S SHOW CAUSE MOTION AS TO WHY
THE DEFENDANT SHOULD NOT BE DEEMED TO
HAVE RECEIVED CONSTRUCTIVE NOTICE OF
PENDING LAWSUIT

NOW COMES THE PRO SE plaintiff, a layman non-attorney, to MOTION this Court as to why the defendant should not be deemed to have been constructively served with notice of this lawsuit. Restated: the plaintiff requests that this Court deem Jason Goodman, defendant, to have received imputed knowledge of this instant lawsuit.

MOTION

Defendant Jason Goodman operates at least one YouTube social media channel known as "JASON GOODMAN". As described in the accompanying PLAINTIFF'S FIRST REQUEST FOR JUDICIAL NOTICE [RJN]", Mr. Goodman, accompanied by two licensed attorneys, has broadcast for publication an extensive analysis of the original complaint [Doc.1, 6/14/2018, Complaint] to a world-wide YouTube audience. Additionally, Mr. Goodman demonstrates his proficiency with the PACER court database to locate the original complaint [Doc.1, 6/14/2018, Complaint] in this video broadcast.

The RJN includes a copy of the court docket from related litigation. This docket indicates that a draft copy of the original complaint was forwarded to Mr. Goodman attached to a document known as "Seventh Declaration of D. George Sweigert, Doc.60, 6/13/2018" (See Steele vs. Goodman, 3:17-cv-00601-MHL, U.S.D.C. for the Eastern District of Virginia) in the related litigation. Therefore, Mr. Goodman has received an un-docketed copy of the original complaint several weeks ago.

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DISCUSSION

Defendant Goodman has provided publication of this instant lawsuit to himself and almost six thousand viewers (5.9K+, RJN) on one (of many) of the defendant's YouTube channels. This YouTube publication by the defendant to himself should be deemed as a self-referential notice of litigation. *Isaiah Walker Jr. v. Harvey Soule*, 138 Mass. (1884), *Heap v. Heap*, 258 Mich. 250, 242 N.W. 252 (1932).

The brazen broadcast of the original complaint and PACER entries to the world-wide YouTube audience should spare the plaintiff of unnecessary expense to serve the summons upon the defendant in this litigation.

PRAYER

The plaintiff prays that this Court will deem the defendant Jason Goodman to have received constructive notice of this lawsuit for the purposes of accruing time to respond to the Amended Complaint [Doc.5, 6/29/2018].

Dated this day of July 2, 2018


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CERTIFICATE OF SERVICE

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On this day, July 2, 2018, I have caused to be placed into the U.S. Postal Service true copies of the
attached pleadings (Notice of Harmless Error, Show Cause Motion, Request for Judicial Notice) with First
Class postage affixed to the following parties.

Clerk of the Court
U.S. District Court
Matthew J. Perry, Jr. Courthouse
901 Richland Street
Columbia, South Carolina 29201

Jason Goodman
252 7th Avenue #6S
New York, NY 10001

I hereby attest under the penalties of perjury that the foregoing is true and accurate.


D. GEORGE SWEIGERT

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